

**IN THE COURT OF COMMON PLEAS FOR FRANKLIN COUNTY, OHIO  
CIVIL DIVISION**

**QUINTON WILLIAMS  
6319 VINCENT GEORGE DRIVE  
CANAL WINCHESTER, OHIO 43110**

**PLAINTIFF,**

**VS.**

**PASCHALL TRUCK LINES, INC.  
c/o David A. Gibbs, Statutory Agent  
3443 HIGHWAY 641 SOUTH  
MURRAY, KENTUCKY 42071**

**CASE NO.: \_\_\_\_\_**

**ORIGINAL CASE NO: 19 CV 009738**

**JUDGE RICHARD FRYE**

**AND**

**CRAIG SIEGEL  
5223 FIRETOWER ROAD  
KILN, MISSISSIPPI 39556**

**DEFENDANTS.**

**RE- FILED COMPLAINT**

1. On or about August 30, 2019, Plaintiff, Quinton Williams, was parked in his truck at L Brands, Inc. World Headquarters, in the City of Columbus, in Franklin County, Ohio, when a semi-truck owned by Defendant, Paschall Truck Lines Inc., and driven by Defendant, Craig Siegel, failed to yield on a right turn and forcefully collided with the Plaintiff's vehicle, resulting in the damages, injuries and consequences as hereinafter set forth.

2. At the time of the incident described in paragraph one (1), Defendant, Craig Siegel, was an employee of Defendant, Paschall Truck Lines, Inc., acting within the course and scope of his employment, as a result of which Defendant, Paschall Truck Lines Inc., was vicariously liable for said Defendant's actions under the doctrine of *respondeat superior*.

**EXHIBIT  
A**

3. Defendant, Craig Siegel, negligently and unlawfully:
  - a. failed to yield while making a right turn;
  - b. drove left of center;
  - c. failed to maintain control over his vehicle;
  - d. failed to maintain his attention on the roadway ahead;
  - e. drove his vehicle at an excessive rate of speed; and
  - f. caused or permitted to cause his vehicle to strike Plaintiff's truck.
4. As a direct and proximate result of the Defendants' conduct, Plaintiff, Quinton Williams, has:
  - a. sustained severe injuries to his head, neck and back;
  - b. suffered and will continue to suffer physical pain, mental anguish, and emotional distress;
  - c. required and will continue to require medical care, attention, and treatment, with resulting expenses;
  - d. sustained and will continue to sustain a loss of earnings and earnings capacity;
  - e. sustained property damage to, reduction in the value of, and loss of the use of his vehicle, including storage and interest charges; and
  - f. suffered and will continue to suffer impairment in the use of the affected areas of his body and a reduction in the quality and enjoyment of his life.

Said damages and injuries are permanent.

**WHEREFORE**, Plaintiff, Quinton Williams, now demands judgment against

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Defendants, Craig Siegel and Paschall Truck Lines, Inc., in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) as compensatory damages, in addition to interest, and his costs incurred herein.

Respectfully submitted,

/s/ Megan R. Hayden

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